

Point Thomson Polar Bear Interaction Plan Supplement to Wildlife Avoidance and Interaction Plan

Purpose

This Polar Bear Interaction Plan is a supplement to the Point Thomson Export Pipeline Wildlife Avoidance and Interaction Plan. Those working in polar bear habitat must be familiar with all of the issues associated with polar bears and working safely in bear country. Polar bear interaction plans are designed to ensure the safety of work areas. Although it is possible to generalize about good work practices in bear habitat, each area and work site has its own unique layout and as such not all of the procedures discussed here may be relevant.

Background

Polar bears are widely distributed at low densities across the North Slope. Both individual single animals and females with cubs may be sighted within the producing oil fields, and greater numbers can sometimes be found around whale carcasses. Although polar bears may be encountered throughout the year, they are most often seen during the fall and winter months. Encounters are most frequent along the coast, although bears have been known to venture inland.

Polar bears are protected under the Marine Mammal Protection Act (MMPA). In accordance with that Act, it is illegal to “hunt, harass or kill, or to attempt to hunt, harass, or kill” a polar bear. It is also illegal to “take” polar bears by harassment including hazing without a Letter of Authorization from USFWS. ExxonMobil holds a Letter of Authorization restricted to non-lethal deterrent activities only. On the North Slope, both the U. S. Fish and Wildlife Service (USFWS) and the Alaska Department of Fish and Game are involved in polar bear issues. ExxonMobil is required to report polar bear sightings to government agencies.

ExxonMobil’s Polar Bear Policy

This policy is designed to prevent human/polar bear interactions and ensure the safety of all personnel. It is the responsibility of all personnel to read, understand, and apply this policy:

- **Check in with Security** before starting work in a remote location.
- **Check your work area** before leaving the safety of a vehicle or building.
- **Dispose of garbage safely.** Do not leave food outside.
- **Move to, or remain in, a safe location.** Do not approach a polar bear for any reason.
- Immediately **notify Security** and the on-site Point Thomson Environmental/Regulatory Compliance Advisor (if at a remote location) as soon as a bear is seen; they will notify other workers as necessary via radio, alarms and other methods.
- Do not take any initiative in dealing with a polar bear; *only designated security officers and other trained personnel are authorized to take any direct action;*
- Anyone who deliberately approaches a polar bear puts themselves and others in danger, and is subject to dismissal.

Security

If a polar bear is sighted, Security will dispatch an officer to keep track of the bear and ensure that all personnel are notified. If a polar bear or polar bear sign is observed, personnel should follow the above-mentioned polar bear policy and:

- Assist security if necessary in completing a Polar Bear Sighting Report.
- The field designated responsible party (eg, Security, Environmental/Compliance Advisor) will distribute the form via fax to USFWS, ADF&G, ExxonMobil Environmental Advisor (Anchorage) per numbers on the attached fax cover sheet within 24 hours.
- Further action will be conducted by ExxonMobil Environmental Advisor (Anchorage) as required by either ExxonMobil personnel or agency personnel.

The ExxonMobil Environmental Advisor should be informed within 24 hours if the bear encounter is routine, and immediately in the case of injury to personnel or the bear. Refer to the *Wildlife Avoidance and Interaction Plan* for the Wildlife Interaction or Sighting Emergency Contact Numbers list.

If personnel are required to work outside, Security should be contacted to verify that no bears have been seen in the area. If workers are required to be in a remote area (or off-pad), Security should be informed; Security personnel may accompany workers if the bear risk is believed to be high. All operations conducted during hours of darkness will be appropriately lit, and may use mobile light towers. Other on-going operations, such as aerial photography and pipeline inspections will note the presence of any bears in the area and will forward that information to Security, who will be responsible for alerting personnel to the presence of a bear. Security and/or the Point Thomson Environmental/Compliance Advisor will report sightings to the USFWS, ADF&G, and the ExxonMobil Environmental Advisor in Anchorage.

Training

In order to obtain a Letter of Authorization (authorized annually from USFWS for operating fields), 50 CFR §18.124 c)(3) states that the application must include:

A polar bear awareness and interaction plan if the activity is on ice or in an area of active ice movement. For the protection of human life and welfare, each employee on site must complete a basic polar bear encounter training course.

To fulfill this training requirement, ExxonMobil has established training levels, in an effort to match training needs with job function. Training is intended to reflect the nature of the work, the location of that work, and the potential exposure to polar bear habitat. All Crew Managers are to be familiar with the Polar Bear Interaction Plan.

Level one: Designed for personnel who are unlikely to encounter a polar bear during the course of work.

Likelihood of polar bear encounters can increase in coastal areas, barrier islands, and offshore operations. Training level one will include basic bear biology, habitat, and behaviors. Individuals will be made aware of methods to reduce the chances of a polar bear encounter. Training will also include sighting report procedures for the work site, and emergency contact numbers within ExxonMobil

Level two: Designed for positions in remote locations, or at camps or workstations in high potential polar bear habitat.

Training will include information presented in training level one, while highlighting specific requirements of the site polar bear interaction plan, reporting requirements, notification and contact information, and designated “safe” areas on site.

Level three: Designed for personnel involved in polar bear hazing and deterrence.

Training level three will provide in depth polar bear awareness training and polar bear hazing training. Hazing training will include information on effective hazing methods, and safety for humans and bears.

Available field training resources:

- North Slope Environmental Field Handbook (available through NSTC Training, North Slope environmental advisors)

- Looks Can Kill: Safety and Polar Bears on the North Slope (Available through Anchorage SHE)
- Polar Bear Awareness Video (Available through Anchorage SHE)
- Additional training materials, such as project specific presentations can be requested by calling ExxonMobil Anchorage SHE – Al Maki or Mike Barker

Potential Attractants

Garbage and Food

Dumpsters approved for food waste disposal are bear proof. Food wastes should not be deposited in any of the remaining non-bear proof dumpsters. All garbage that contains food should be bagged before being deposited into animal-proof dumpsters. Personnel should avoid carrying garbage or food around with them as it attract bears. Refer to the *Wildlife Avoidance and Interaction Plan* for details on waste management practices.

Materials

Pipe, oil, hydraulic fluid, glycol, and many other materials are anticipated to be stockpiled in the oil fields. Liquids, like corrosion inhibitor, are anticipated to be stored together in DOT-approved chemical totes, in warehouses or on storage pads. These containers are bear proof. It is anticipated that dry materials will be stored in packs on pallets. Where possible, snow will be regularly removed from around the stacks of materials to minimize potential bear hiding places. In addition, exterior stored pallets and drums will either be placed very close together or will be separated widely enough in an attempt to eliminate potential hiding places.

Carcasses

Although native hunters seldom harvest whales near oilfields, oilfield workers should be aware that whale carcasses frequently attract one or more polar bears. Whale carcasses can attract curious onlookers, often by invitation from native hunters. Oilfield workers should not, in general, approach whale carcasses even if a native hunter has invited visitors.

Record Keeping

Whenever a bear is detected a **record** must be made of the observations and any action taken. All sightings, of bears or sign of bears (such as tracks) must be compiled by Security or the on-site Environmental Technician, and forwarded to ExxonMobil Environmental Advisor (Anchorage), and to the appropriate contacts at the USFWS and Alaska Department of Fish and Game. ExxonMobil maintains a database of all polar bear sightings. The Polar Bear Sighting Form to be used is attached to this document.

Monitoring

Record keeping in the oil fields is intended not only to assist in oilfield safety, but also to supplement USFWS data collection. The polar bear sighting reports serve the purpose of monitoring the short-term direct effects oilfield activities may have on individual polar bears, by assessing localized changes in movements, behavior, and habitat use of polar bears in response to industry activities.

Date: _____
Time: _____

Polar Bear Sighting Report

Location (indicate movements through oilfield if encounter is of long duration):

Observer name:

Weather conditions:

Fog _____ Snow _____ Rain _____ Clear _____
Other _____

Total number of bears: _____ #Sow/cubs ____/____ #Adult _____ #Subadult _____

Estimated distance of bear from personnel/facility: _____

Possible attractants present:

Bear behavior:

Curious _____ Aggressive _____ Predatory _____
Other _____

Description of encounter: _____

Injuries sustained: _____

Deterrents used/distance: Vehicle _____ Noise-maker _____ Firearms _____

Other _____

Duration of encounter:

Agency/ExxonMobil Contacts:

USFWS _____	Time: _____	Date: _____
ADFG _____	Time: _____	Date: _____
ExxonMobil _____	Time: _____	Date: _____